

REMARKS

Claims 1-23 are pending, with claims 1, 5, 16 and 20 being independent. Claims 1, 5, 16 and 20 have been amended. No new matter has been added. Reconsideration and allowance of the above-referenced application are respectfully requested.

The claims stand objected to for failing to include line numbering. As explained in the office action, the suggested line numbering represents a preferred format and is not required. The suggested line numbering has been included with the claims in this response. Thus, withdrawal of the claim objections is respectfully requested.

Claims 1, 4-5, 14-16, 19, 20, 22 and 23 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over U.S. Patent No. 5,568,487 (Sitbon) in view of U.S. Patent No. 6,145,031 (Mastie). This contention is respectfully traversed.

Independent claims 1, 5, 16 and 20 have been amended to clarify the claimed subject matter. Support for these amendments can be found throughout the application as filed. These claims make clear that a call corresponding to an application program interface (API) for a first transport-layer connection-oriented protocol, such as TCP/IP (Transmission Control Protocol/Internet Protocol), is translated to one or more protocol messages defined by a second transport-layer connection-oriented protocol, such as a lightweight SAN (System Area Network) protocol, if the call and the file descriptor are of a first type, where the one or more protocol messages are recognized by a node or device that obtains the one or more protocol messages for processing according to the first transport-layer connection-oriented protocol. The art of record fails to teach or suggest this claimed subject matter.

Sitbon teaches an address conversion process that allows translation of a call for a first API, the socket interface for a TCP/IP network, into a call for a second API, the XTI interface (X/OPEN transport interface) for an OSI/CO (open system interconnection / connection-oriented) network. Sitbon operates at the application program interface level and does not teach or suggest translating an API call corresponding to a first protocol into one or more protocol messages defined by a second protocol.

Mastie fails to cure this defect in Sitbon. Rather, Mastie is used solely for the proposition that "a network can be interchangeably implemented as a TCP/IP, internet or System Area Network". While this may be true in the context of Mastie, where a system for queuing elements, such as print jobs, is described in the context of a network that connects clients to a print manager, this does not provide the necessary motivation to combine the Sitbon and Mastie references. These references relate to completely different aspects of a network system. Moreover, the suggestion that it would have been obvious to implement Sitbon's TCP/IP network as a system area network contradicts the teachings of Sitbon, which clearly address the fact that TCP/IP networks are here to stay, and thus how to handle the necessary coexistence of TCP/IP and OSI/CO networks. See Sitbon at col. 1, lines 18-49. Thus, there is insufficient motivation to combine the Sitbon and Mastie references.

For all of these reasons, it is respectfully suggested that independent claims 1, 5, 16 and 20 are patentable over the art of record. Dependent claims 4, 14-15, 19, 22 and 23 are patentable based on the above arguments and their own merits. For example, claims 4, 15, 19 and 23 have been amended to clarify that the communications identifier being mapped to the file descriptor corresponds to a network connection managed by

another node or device. The art of record fails to teach or suggest this aspect of the claimed subject matter.

Claims 2 and 3 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Sitbon and Mastie in view of U.S. Patent No. 6,081,900 (Subramaniam). Claims 6-7 and 10-12 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Sitbon and Mastie in view of U.S. Patent No. 6,694,375 (Beddus). Claim 8 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Sitbon and Mastie in view of U.S. Patent No. 6,665,674 (Buchanan). Claim 9 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Sitbon and Mastie in view of U.S. Patent No. 6,615,201 (Seshadri) in further view of U.S. Patent No. 6,625,258 (Ram). Claim 13 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Sitbon and Mastie in view of Subramaniam. Claims 17 and 18 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Sitbon and Mastie in view of Subramaniam. Claim 21 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Sitbon and Mastie in view of Subramaniam. These contentions are respectfully traversed.

Claims 2-3, 6-13, 17-18, and 21 each depend from an allowable base claim for the reasons discussed above. Additionally, dependent claims 2-3, 6-13, 17-18, and 21 are patentable based on their own merits. For example, with respect to claims 6-12, there is insufficient motivation to combine Beddus with Sitbon. These two references describe unrelated technologies, and no motivation to combine has been identified in the references themselves. Moreover, it should be noted that the lightweight protocol messages of the present claims refer to lightweight network communication protocol messages, as made clear in the present specification (see page 4, lines 6-12), and

are wholly unrelated to LDAP (lightweight directory access protocol).

It is respectfully suggested for all of these reasons, that the current rejection is totally overcome; that none of the cited art teaches or suggests the features which are now claimed, and therefore that all of these claims should be in condition for allowance. A formal notice of allowance is thus respectfully requested.

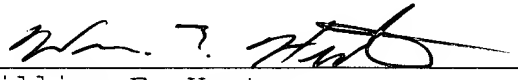
Additionally, it is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific issue or comment does not signify agreement with or concession of that issue or comment. Because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

No fees are believed due with this reply. Please apply any necessary charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: July 8, 2004

Fish & Richardson P.C.  
PTO Customer Number: **20985**  
12390 El Camino Real  
San Diego, CA 92130  
Telephone: (858) 678-5070  
Facsimile: (858) 678-5099  
10407868.doc

  
William E. Hunter  
Reg. No. 47,671  
Attorney for Intel Corporation